

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

In re: Karen Ridgel-Langford)	
)	Case No. 12-42160
)	Chapter 13
)	
Debtor(s))	Notice of Hearing and Motion
)	to Impose the Automatic Stay
)	Hearing Date: April 18, 2012
)	Hearing Time: 10:00 AM
)	
)	Susan E. Skelton, #55027MO
)	Skelton Law Firm
)	2700 Macklind Ave., First Floor
)	St. Louis, MO 63139

NOTICE OF MOTION

PLEASE TAKE NOTICE that the Debtor Karen Ridgel-Langford, through her attorney, Susan E. Skelton, is seeking to Impose the Automatic Stay with regard to all property in her bankruptcy case #12-42160. Such Motion will be called for hearing before the Honorable Barry S Schermer, Thomas F. Eagleton Building (U.S. Courthouse), 111 South Tenth Street, Courtroom 5 North, St. Louis, MO on April 18, 2012 at 10:00 AM.

WARNING: Any response or objection must be filed with the Court five business days prior to the hearing date. A copy may be promptly served upon the undersigned. Failure to file a timely response may result in the Court granting the relief requested prior to the hearing date.

MOTION TO IMPOSE THE AUTOMATIC STAY

COMES NOW, Debtor, through her attorney, and in support of her request that the Automatic Stay be imposed states as follows:

1. Debtor filed the above captioned case in good faith on March 12, 2012.
2. Debtor had two previous cases pending in the past year being: case #11-53051 that was dismissed on February 16, 2012 by Motion of the Trustee's office for failure to make plan payments; case #11-44868, which was dismissed on September 23, 2011 for failure to make plan payments.
3. Pursuant to 11 U.S.C. §362(c)(4)(A), the automatic stay must be imposed by the Court upon request of the Debtor or other party to be in effect, if requested in good faith.
4. The Court may impose the automatic stay for the life of the case pursuant to 11 U.S.C. §362(c)(4)(B).
5. Debtor's current case is filed in good faith. Debtor has filed all necessary schedules.
6. Debtor's first case was dismissed for failure to make plan payments. In Debtor's Motion to Extend Stay filed with her second case, she indicated that there was a lack of communication between herself and her previous attorney, which caused confusion on the Debtor's part and a misunderstanding of her responsibilities.

7. Debtor's father-in-law passed away very shortly after her second case #11-44868 was filed, which caused a financial hardship on her family due to funeral and travel expenses; subsequently, Debtor's husband was hospitalized for an illness and was out of work for almost two weeks.
8. Debtor was also ill and missed work due to the funeral, her husband's illness and her own illness.
9. Debtor was not able to get the money to her attorney's office in time to avoid dismissal or to reinstate the case, due to her illness.
10. Debtor's change in circumstance is that she and her husband are both back to work full-time and can now make the plan payments.
11. If the automatic stay is not imposed, Debtor may lose her home to foreclosure by Nationstar Mortgage.
12. It is important and essential to Debtor that she retain her home, as it is her family's residence.

WHEREFORE, Debtor respectfully requests that this court impose the automatic stay in this case to the conclusion of the case, and for any and all further relief which this Court deems just and proper in the premises.

DATE: March 13, 2012

Respectfully Submitted,

/s/ Susan E. Skelton

Susan E. Skelton

MBE #55027, USED #55027MO

Skelton Law Firm

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Attorney for Debtors

Certificate of Service

A copy of the foregoing was served via the Court's electronic means or mailed postage prepaid on March 13, 2012 to the following creditors and/or parties in interest:

John V. LaBarge, Jr.
Chapter 13 Trustee
PO Box 430908
St. Louis, MO 63143

Bank of America
Po Box 17054
Wilmington, DE 19850

Brother Loan and Finance Co.
C/O John Henry Soeder III
7730 Carondelet Ave. STE 450
Saint Louis, MO 63105

Collector of Revenue
41 South Central
Attn: Division of Collection
Saint Louis, MO 63105

Department of Education/Sallie Mae
PO Box 9635
Wilkes Barre, PA 18773

Internal Revenue Service
Attention: Bankruptcy Unit
PO Box 7346
Philadelphia, PA 19101-7346

Metropolitan Sewer District
2350 Market Street
Saint Louis, MO 63103

Millsap & Singer, P.C.
612 Spirit Drive
Chesterfield, MO 63005

Missouri Department of Revenue
Attn: Bankruptcy Unit
P.O. Box 475
Jefferson City, MO 65105

Nationstar Mortgage LLC
350 Highland Dr
Lewisville, TX 75067

US Department of Education- Direct Loans
PO Box 5609
Greenville, TX 75403

/s/ Susan E. Skelton